

M/019/005

From: Tony Gallegos
To: ~~XXXXXXXXXX~~ WAYNE HEDBERG, DOGM
Subject: M/019/005 Moab Salt - permit status

4/18/96 - Here are the pertinent pieces of information describing the current status of the Moab Salt permit.

On June 28, 1994 DWQ sent Moab Salt a letter in an attempt to finalize the Conceptual Water Control Plan which DOGM had stipulated as a condition of final approval. DWQ requested information describing leak detection techniques which were to be tested by Moab Salt. The letter mentions there are several other technical issues relevant to the Conceptual Water Control Plan described in a 10/11/90 letter which need to be resolved.

On August 12, 1994, representatives from DWQ's UIC & Stormwater sections, Moab Salt, & the Division held a meeting at DEQ offices to discuss the outstanding permit issues. Moab Salt presented copies of documents describing the leak detection tests which they had performed. During this meeting it was discovered that Moab Salt's General Permit submittal for Stormwater regulations was not received. It was thought that perhaps the permit was submitted under the parent company name of Texas Gulf. It was pointed out that due to Moab Salt's potash extraction, the General Permit would not be appropriate. The meeting concluded with the following understandings: Moab Salt & DWQ agreed to track down the Stormwater Permit application. Moab Salt would look into other possible leak detection methods. It was suggested that Moab Salt provide DWQ & DOGM with drawings/schematics describing the salt migration prevention system currently in place.

As of this date (4/18/96) DOGM has not received any new information regarding the stormwater permit, alternate leak detection methods, or information describing the salt migration system currently in place. There was rumor of Moab Salt changing ownership, however the annual report for 1995 mentions no such change.

A COPY OF THIS UPDATE WILL BE SENT TO THE FILE - F.Y.I.

CC: joelle